

**WOMBLE
CARLYLE
SANDRIDGE
& RICE**
A PROFESSIONAL LIMITED
LIABILITY COMPANY

1401 Eye Street, NW
Seventh Floor
Washington, DC 20005

Telephone: (202) 467-6900
Fax: (202) 467-6910
www.wcsr.com

Jennifer M. Kashatus
Attorney
Direct Dial: (202) 857-4506
Direct Fax: (202) 261-0006
E-mail: JKashatus@wcsr.com

February 27, 2009

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

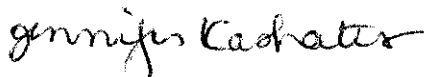
Re: CPNI Certification, EB-06-36

Dear Ms. Dortch:

On behalf of O1 Communications, Inc., enclosed please find the company's annual CPNI certification for filing in the above-referenced docket. Please contact me at 202-857-4506 if you have any questions regarding this filing.

Respectfully submitted,

WOMBLE CARLYLE SANDRIDGE & RICE
A Professional Limited Liability Company



Jennifer M. Kashatus

cc: Best Copy & Printing (via email)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification:

O1 Communications, Inc., Form 499 Filer ID: 819698

Name of signatory: R. Keenan Davis

Title of signatory: Vice President and General Counsel

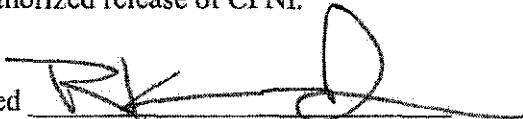
I, R. Keenan Davis, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in black ink, appearing to be 'R. Keenan Davis', written over a horizontal line.

R. Keenan Davis
Vice President and General Counsel
O1 Communications, Inc.

O1 COMMUNICATIONS, INC.
STATEMENT REGARDING CUSTOMER PROPRIETARY NETWORK
INFORMATION OPERATING PROCEDURES

February 27, 2009

This statement is filed on behalf of O1 Communications, Inc. ("O1" or "Company") pursuant to 47 C.F.R. § 64.2009(e) to demonstrate how O1's operating procedures are designed to ensure compliance with the Commission's CPNI rules.

Certification

O1 requires a corporate officer to act as agent for the company and to sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures which are adequate to ensure compliance with applicable CPNI rules.

Use, Disclosure and Access to CPNI

O1 does not use, disclose or permit access to its customers' CPNI except as any such use, disclosure or access is permitted by Section 222 of the Telecommunications Act of 1996.

Use of CPNI for Marketing Purposes

O1 does not use CPNI to market services to customers outside of the category of service to which the customer already subscribes. O1 also does not share CPNI with its affiliates, or third parties for any marketing purposes. If, in the future, O1 seeks to use CPNI to market services to customers that are outside of the category of service to which the customer subscribes or to share CPNI with affiliates or third parties, O1 will provide notice to its customers advising them of their right to approve or disapprove of the proposed uses of CPNI. O1 will maintain a list of customer preferences.

O1 will ensure that all marketing campaigns using CPNI obtain receive prior approval. O1 will maintain records of all marketing campaigns that use CPNI in accordance with the FCC's rules.

Call Detail Information

O1 has implemented a policy prohibiting the release of Call Detail Information to any customer during an in-bound call. If an O1 employee receives a request for Call Detail Information, he/she may provide that information to the caller by sending the information to the address of record or calling the customer back at the telephone number of record. O1 does not allow an employee to disclose any Call Detail Information to the customer other than the Call Detail Information that the customer already has disclosed.

Safeguarding CPNI

O1 takes the privacy and security of CPNI seriously. O1 has established authentication procedures applicable to incoming calls. O1 has also established detailed procedures for processing certain account changes and requires the applicable personnel to notify customers immediately of such account changes. O1 also has implemented network safeguards including but not limited to encrypting certain data. O1 does not have retail locations.

O1 also has implemented procedures for monitoring any unlawful attempts to gain access to its customers' CPNI. If O1 becomes aware that a pretexter has attempted to gain access to CPNI

within O1's possession, O1 will notify the FCC of any information that it obtains regarding a pretexter's attempts to gain access to CPNI as required by the FCC's rules.

Employee Training

O1 trains its employees as to when they are and are not permitted to use, permitted access to, or permitted to disclose CPNI. O1 has a disciplinary process in place to address any noncompliance with its policies, including policies regarding CPNI, which includes the potential for termination.

Customer Complaints

O1 will track customer complaints that it receives regarding CPNI and will report those complaints per the categories identified in the FCC's rules.

Notice of Security Breaches

O1 will notify law enforcement and customers upon discovery of a breach of CPNI in accordance with 7 C.F.R. § 64.2011(e). O1 maintains a record of all security breaches and notifications.

End of CPNI Policy and Procedures Statement